IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

| MBIA INSURANCE CORPORATION, et al., | .) |
|--|------------------------|
| Plaintiffs/Counterclaim Defendants, |) |
| |) C.A. No. 02-1294-JJF |
| v. |) |
| ROYAL INDEMNITY COMPANY, |) |
| Defendant/Counterclaim Plaintiff. | } |
| | . 🖯 |
| CHARLES A. STANZIALE, JR., Ch. 7 Trustee, Plaintiff, |) |
| V. |) CAN-04 1551 HE |
| ٧. |) C.A. No. 04-1551-JJF |
| PEPPER HAMILTON LLP, et al., |) |
| Defendants. |) |
| CHARLES A. STANZIALE, JR., Ch. 7 Trustee, | Ó |
| Plaintiff, | ĺ |
| |) |
| v. |) C.A. No. 05-72-JJF |
| |) |
| McGLADREY & PULLEN LLP, et al., | j |
| Defendants. |) |
| ROYAL INDEMNITY COMPANY, | j |
| Plaintiff, | j |
| | j |
| v. |) C.A. No. 05-165-JJF |
| |) |
| PEPPER HAMILTON LLP, et al., |) |
| Defendants. |) |

EMERGENCY MOTION OF ROYAL INDEMNITY COMPANY FOR LEAVE TO REPLACE STRICKEN EXPERT WITNESSES

ASHBY & GEDDES SONNENSCHEIN NATH & ROSENTHAL LLP Lawrence C. Ashby (#468) Michael H. Barr Philip Trainer, Jr. (#2788) Alan S. Gilbert Tiffany L. Geyer (#3950) John Grossbart Andrew D. Cordo (#4534) Kenneth J. Pfaehler 500 Delaware Avenue, 8th Floor 1221 Avenue of the Americas Wilmington, Delaware 19899 New York, New York 10020-1089 (302) 654-1888 (212) 768-6700 (302) 654 2067 (Fax) (212) 768-6800 (Fax)

Attorneys for Royal Indemnity Company

For the reasons set forth fully in the accompanying memorandum, Royal Indemnity Company ("Royal") hereby brings this emergency motion for leave to replace stricken expert witnesses and to file replacement expert reports by June 15, 2007. In compliance with District of Delaware Local Rule 7.1.1, Royal has made a reasonable effort to reach an agreement with respect to the subject matter hereof, but was unable to do.

Dated: May 29, 2007

Respectfully submitted,

ASHBY & GEDDES

/s/Philip Trainer, Jr.

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